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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA, )  
10 )  
11 Plaintiff, ) Case No.: 2:21-CR-00311-JAD-VCF  
12 vs. )  
13 ARLETTE ALEXIA MORENO, ) STIPULATION TO CONTINUE  
14 ) SENTENCING DATE  
15 Defendant. ) (SECOND REQUEST)  
16 \_\_\_\_\_)

17 *Certification:* This stipulation is filed pursuant to General Order 2007-04.

18 IT IS HEREBY STIPULATED AND AGREED, by and between JASON M.  
19 FRIERSON United States Attorney, through PATRICK BURNS, and SARAH A. KIEWLICZ,  
20 Trial Attorneys, Department of Justice-Tax Division, and Gabriel L. Grasso, Esq, counsel  
21 for ARLETTE ALEXIA MORENO (MORENO), that the sentencing hearing currently  
22 scheduled for October 4, 2022, at 11:00 am., be vacated and continued to a date and time  
convenient to this court, but no event earlier than THIRTY (30) days.

23 Pursuant to General Order No. 2007-04, this stipulation is entered and based upon  
the following:

- 24 1. MORENO is on pretrial release, employed full time, and does not oppose this  
continuance.
- 25 2. The parties agree to the continuance.
- 26 3. Defense counsel learned he will have to be out of the jurisdiction on a family matter  
the week of October 2<sup>nd</sup>, 2022.
- 27 4. The parties have conferred on new dates and both Washington D.C. based Trial  
28 Attorneys Patrick Burns and Sarah Kiewlicz will be present in Las Vegas on other matters

(U.S. Vs Melvin Orellana case no: 2:22-cr-00084-APG-BNW & U.S. vs King Isaac Umoren  
Case no: 2:16-cr-00374-APG/2:19-cr-00064-APG-NJK) between 9/19 and 9/23 2022 as  
well as between 10/31 and 11/4 2022.

5. The parties request this sentencing be reset sometime during the above listed range  
of dates when all parties will be present and available to appear at sentencing.

6. Denial of this request for continuance would deny the defense sufficient time to be  
able to assist in defendant's sentencing and file a Sentencing Memorandum with the court.

7. This is the second request for a continuance and or reset of the sentencing date in  
this case.

DATED this 18<sup>th</sup> day of August, 2022.

RESPECTFULLY SUBMITTED BY:

/s/ Patrick Burns  
PATRICK BURNS  
Trial Attorney- Tax Division

/s/ Gabriel L. Grasso  
GABRIEL L. GRASSO  
Attorney for MORENO

/s/ Sarah A. Kiewlicz  
SARAH A. KIEWLICZ  
Trial Attorney -Tax Division

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16 **FINDINGS OF FACT**

17 Based upon the submitted Stipulation, and good cause appearing therefore, the  
18 Court finds that:

- 19 1. Defense counsel learned he will have to be out of the jurisdiction on a family matter  
20 the week of October 2nd, 2022.  
21 2. MORENO is on pretrial release and does not oppose to the continuance.  
22 3. The parties agree to the continuance.

23 ///

24 ///

## **CONCLUSIONS OF LAW**

Denial of this request for continuance would result in a miscarriage of justice.

## ORDER

**IT IS ORDERED** that the sentencing hearing currently scheduled for October 4, 2022, at 11:00 a.m., be vacated and continued to October 31, 2022, at 10:00 a.m.

## IT IS SO ORDERED:

**UNITED STATES DISTRICT JUDGE**

DATED: 8/25/2022